

## EXHIBIT 184

**From:** Valcarcel, Luis [OMP]  
**To:** Kuntz, Ron [OMP]; Lowman, Paul [OMPUS]  
**CC:** Valcarcel, Luis [OMP]  
**Sent:** 6/25/2012 11:58:45 AM  
**Subject:** FW: NUCYNTA Trade Plans  
**Attachments:** High Level Overview of JOM CII and SOM Process.doc

Ron-Paul:

The attached was provided by Yvonne who manages the CII team at JOM. The bullets below were summarized by Mashett who is assisting us with the weekly tracking reports. I will work with Paul on addressing request from the field sales team when they arise regarding product availability. Please continue to send me updates of hot spot markets prescribers writing the higher strengths so I can also provide that data to the JOM Planners and Wholesaler Buyers. CSOS will certainly accelerate speed to market with shipments.

We can discuss further later on our call. I would like to circulate our plans to all internal partners with any additional input from both of you.

Thanks.

Luis

- There are 62,937 retail pharmacies in the U.S. not all dispense CII's. Trade Analytics is check 3<sup>rd</sup> party data sources to identify percentage that do not dispense CII's. Once number of non CII dispensing pharmacies are identifies these need to be removed the base line number of the percentage of pharmacies nationally that are stocking NUCYNTA IR and ER.
- ValueTrak EDI 852 data has McKesson and Cardinal consistently over 99+% in stock levels at a macro level. There are some deviations from the 99+ stocking levels at a few selected distribution centers.
- ValueTrak EDI 852 data for ABC at a macro level is slightly below 98% there is further analysis being conducted as there were some distribution centers that were out of stock on some dosage strengths.
  - Luis will join weekly calls with ABC Buyer and JOM planner with an action plan to proactively track stocking levels at the distribution centers based on hot spot markets and formulary wins. ABC agreed to move inventory internally as needed.
- JOM is running a report every DOS report every Tuesday and Thursday to keep a close eye on DC inventory. JOM planners will reach out to DC buyers as needed, in case 222 forms need to be expedited or have recommendations for their orders.
- When there are reports pertaining to a retail pharmacy or institution that are unable to get our product from their distributor, the information that is required for an accurate investigation is as follows:
  - **Retail Pharmacy**  
Name of Pharmacy, pharmacy buyer, street address, city, zip code, phone number, distributor, the distribution center that services the store, the NDC involved, date of the incident and complete description of the incident.
  - **Institution**  
Complete name of institution, pharmaceutical buyer, street address, city, zip code, phone number distributor, the distribution center that services the store, the NDC involved, date of the incident and complete description of the incident.
- **JOM Schedule II Order Process**
  - Wholesaler submits paper DEA 222 Form to JOM for processing
  - Most forms are submitted via overnight mail and usually received at JOM by 10 am.

Schedule II Ordering/Shipping Days

Customer	222's Rec'd	Orders Ship
ABC	Friday	Tuesday
Cardinal	Monday	Tuesday
McKesson	Tuesdays	Thursday
Cardinal	Wednesday	Friday

If there is going to be a spike in demand in a identified geographic area Trade needs to be made aware. This can help in any potential delays at the distributor and JOM level due to suspicious order monitoring.

○ **Definition of Suspicious/Excessive**

A potentially suspicious or excessive controlled substance order can be defined as an order **that exceeds the minimum order quantity requirements**, and is above 3x's (300% of) the calculated, 12 month, per weekly order average. (This definition also applies to products that are scheduled in one or more states, but not by the DEA.)

## High Level Overview of JOM Suspicious (or Excessive) Order Monitoring (SOM)

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- Orders are entered the same day received. All orders must be entered by 2:30 pm.
- BW Suspicious Order Monitoring (SOM) report starts generating at 2:30 pm.

### JOM Suspicious Order Report

- BW Report is generally completed by 4:00 pm.
- The report will return results of any Narcotic orders (Schedule II – V) for which the order quantity is greater than or equal to 3 x (300% of) the calculated, 12 month, per order average.
- All Schedule II – V orders not identified as Suspicious or Excessive (orders not appearing in the report) are released from hold at the end of the day (after 4:00 pm).
- All Schedule II - V orders that are viewed as potentially suspicious or excessive (orders appearing in the report) will continue to be held and the customer will be contacted by a Customer Service Schedule II Team Member to request an explanation for the increased demand and change in order pattern (more than one order processed per product per week).
  - The customer is contacted with the following script:
 

*"JOM is committed to complying with all DEA guidelines and regulations. Part of that commitment requires us to identify suspicious or excessive orders and notify the DEA accordingly. We have noticed this week's order has exceeded your normal demand. Please provide the reason for your increase in demand."*
- Once the reason for the increase is received, then Customer Service will run a Valuetrak report that will show the customers inventory and compare to the demand of the increase.
- The Schedule II Team Member will forward the customers' order information, customer response for increase and Valuetrak spreadsheet to JOM DEA Compliance (Art Dysart & Mike Levitt) for further review.
- JOM DEA Compliance will use the data provided and the customer communication to determine if the request for the order quantity is substantiated and will notify a Schedule II Team Member of their determination (i.e., order can be released or quantities must be reduced prior to release).
- Should the customer refuse to provide an explanation for the increase in demand, the Schedule II Team Member will explain to the customer that the order cannot be shipped unless clearance is received from JOM DEA Compliance.

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